

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON GRAND JURY 2020
JUNE 10, 2021 SESSION



UNITED STATES OF AMERICA

v.

CRIMINAL NO.

5:21-cr-00090

21 U.S.C. § 841(a)(1)
18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(a)(2)
18 U.S.C. § 924(c)(1)(A)

CAYLA DANIELLE LINDSAY

I N D I C T M E N T

The Grand Jury Charges:

COUNT ONE

(Possession with Intent to Distribute Heroin)

On or about July 23, 2020, at or near Beckley, Raleigh County, West Virginia, and within the Southern District of West Virginia, defendant CAYLA DANIELLE LINDSAY knowingly and intentionally possessed with the intent to distribute a quantity of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWO

(Use and Carry a Firearm During and in Relation
to a Drug Trafficking Crime)

On or about July 23, 2020, at or near Beckley, Raleigh County, West Virginia, and within the Southern District of West Virginia, defendant CAYLA DANIELLE LINDSAY, did knowingly use and carry a firearm, that is a Springfield, model XDS9, 9mm semi-automatic pistol, during and in relation to a drug trafficking crime for which she may be prosecuted in a court of the United States, that is, possession with the intent to distribute heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT THREE
(Distribution of Heroin)

On or about January 26, 2021, at or near Beckley, Raleigh County, West Virginia, and within the Southern District of West Virginia, defendant CAYLA DANIELLE LINDSAY knowingly and intentionally distributed a quantity of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR
(Felon in Possession of a Firearm)

1. On or about May 6, 2021, at or near Beckley, Raleigh County, West Virginia, and within the Southern District of West Virginia, defendant CAYLA DANIELLE LINDSAY, did knowingly possess a SCCY, model CPX-2, 9mm semi-automatic pistol, in and affecting interstate commerce.

2. At the time defendant CAYLA DANIELLE LINDSAY possessed the aforesaid firearm, she knew she had been convicted of a crime punishable by a term of imprisonment exceeding one year, as defined in 18 U.S.C. § 921(a)(20), that is, convicted on or about March 27, 2014, in the United States District Court for the Southern District of West Virginia of distribution of a quantity of oxycodone, in violation of 21 U.S.C. § 841.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

NOTICE OF FORFEITURE

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 28 U.S.C. § 2461(c), 18 U.S.C. § 924 (d) (1).

Pursuant to 28 U.S.C. § 2461(c), 18 U.S.C. § 924 (d) (1) and Rule 32.2(a) of the Federal Rules of Criminal Procedure, upon the conviction of defendant CAYLA DANIELLE LINDSAY, of violations of 18 U.S.C. § 922(g)(1) and 18 U.S.C. § 924(a)(2) and 18 U.S.C. § 924(c)(1)(A) as charged in the Indictment, shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offenses and any property, including any firearms or ammunition, used, intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses including but not limited to the following, a SCCY, model CPX-2, 9mm semi-automatic pistol, serial number: 877476, a Springfield, model XDS9, 9mm semi-automatic pistol, serial number: S3871073, and all related ammunition.

LISA G. JOHNSTON
Acting United States Attorney

By:


TIMOTHY D. BOGGESS
Assistant United States Attorney